

March 10, 2003

CERTIFIED MAIL #9058 7739

Allan DeLange
President
J. L. Manta, Division of
Kenny Industrial Services, LLC
141 – 141st Street
Hammond, Indiana 46327

Re: Registered Operation Status, 089-17249-00482

Dear Mr. DeLange

The application from J. L. Manta, Division of Kenny Industrial Services, LLC received on December 24, 2002 has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following Metals Preparation Facility located at 141 – 141st Street, Hammond Indiana, is classified as registered:

- (a) Thirty-two (32) natural gas burning space heaters, with a combined maximum capacity of 9.36 MMBtu/hr heat input, using no control equipment as control, and exhausting to various stacks.
- (b) Shot Blasting Operation with a maximum capacity of 0.143 tons per hour of black beauty abrasive, with a cartridge dust collector, and vents inside the building.
- (c) Spray Paint Operation with a maximum design rate of 0.58 gallons per hour of paint, using no control devices, and no stacks.

The following conditions shall be applicable:

Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following:

- (a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the spray booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance painting.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the spray booth is in compliance with this requirement.

Pursuant to 326 IAC 6-3-2, the particulate from the shot blaster shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour.

The shot blaster process shall be limited to 1.11 lbs/hr. The dust collector, for the blasting room shall be in operation at all times the shot blaster is in operation, in order to comply with this limit.

Pursuant to Hammond Air Quality Control Ordinance #3522 (as amended), the source will be required to annually submit a statement of the actual emissions of all federally regulated pollutants from the source, for the purpose of source classification.

This registration is the first registration issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3). The annual notice shall be submitted to:

Compliance Data Section
Office of Air Quality and
100 North Senate Avenue
Indianapolis, IN 46206-6015

Hammond Department of Environmental
Management
Air Pollution Control Division
5925 Calumet Avenue
Hammond, Indiana 46320

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 and the Hammond Air Quality Control Ordinance #3522 (as amended), if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Ronald Novak, Director
Hammond Department of Environmental Management

KM

cc: Permits Administrator – Mindy Hahn

Registration Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3).

Company Name: J. L. Manta, Division of Kenny Industrial Services, LLC
Address: 141 – 141 st Street
City: Hammond
Authorized Individual: Allan DeLange
Phone #: (312) 644-5437
Registration #: 089-17249-00482

I hereby certify that J.L. Manta, Division of Kenny Industrial Services, LLC is still in operation and is in compliance with the requirements of Registration 089-17249-00482.

Name (typed): Allan DeLange
Title: President
Signature:
Date:

**Indiana Department of Environmental Management
Office of Air Quality
and
Hammond Department of Environmental Management
Air Pollution Control Division**

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name: J. L. Manta, Division of Kenny Services, LLC
Source Location: 141-141st Street, Hammond, Indiana 46320
County: Lake
SIC Code: 1721 – Industrial Painting
Operation Permit No.: 089-17249-00482
Permit Reviewer: Kristina Massey

The Hammond Department of Environmental Management (HDEM) has reviewed an application from J. L. Manta, Division of Kenny Services, LLC relating to the operation of a Metals Preparation Facility, which includes Shot Blasting, Painting and Natural Gas Burning Heaters.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Thirty-two (32) natural gas burning space heaters, with a combined maximum capacity of 9.36 MMBtu/hr heat input, using no control equipment as control, and exhausting to various stacks.
- (b) Shot Blasting Operation with a maximum capacity of 0.143 tons per hour of black beauty abrasive, with a cartridge dust collector, and vents inside the building.
- (c) Spray Paint Operation with a maximum design rate of 0.58 gallons per hour of paint, using no control devices, and no stacks.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) OP 01997, issued on January 30, 2002;
- (b) OP 01998, issued on January 30, 2002; and
- (c) OP 01999, issued on January 30, 2002.

All conditions from previous approvals were incorporated into this permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Director that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on December 24, 2002.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (three (3) pages).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	17.094
PM-10	13.340
SO ₂	0.025
VOC	9.117
CO	3.445
NO _x	4.101

HAP's	Potential To Emit (tons/year)
Xylene	7.0
Ethylbenzene	1.3
TOTAL	8.3

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutant(s) are less than 100 tons per year and less than 25 tons per year of VOC for sources located in Lake County. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

The potential to emit of particulates is greater than 5 tons per year and less than 25 tons per year, therefore they are subject to 326 IAC 2-5 - Registration. Pursuant to Hammond Air Quality Control Ordinance #3522 (as amended), the source will receive Local Operation Permits for these facilities.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 HDEM emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.159
PM-10	0.158
SO ₂	0.004
VOC	2.365
CO	0.491
NO _x	0.585
HAP	2.214

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM-10	Moderate nonattainment
SO ₂	Primary nonattainment
NO ₂	Attainment/unclassifiable
Ozone	Severe nonattainment
CO	Attainment/unclassifiable
Lead	Attainment/unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as nonattainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Lake County has been classified as nonattainment for particulate matter less than 10 microns (PM-10) and sulfur dioxide (SO₂). Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	0.751
PM10	0.747
SO ₂	0.025
VOC	9.117
CO	3.445
NO _x	4.101

This existing source is **not** a major stationary source because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year, and it is not in one of the 28 listed source categories.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source. This status has been verified by the Hammond Department of Environmental Management (HDEM).

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Lake County and the potential to emit VOC and NO_x is less than ten (10) tons per year. The source is not one of the twenty-eight (28) listed sources and its potential to emit PM₁₀ is less than one-hundred (100) tons per year including fugitive emissions, therefore, 326 IAC 2-6 does not apply.

Pursuant to Hammond Air Quality Control Ordinance #3522 (as amended), the source will be required to annually submit a statement of the actual emissions of all federally regulated pollutants from the source, for the purpose of source classification.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of twenty percent (20%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the spray booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance painting.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the spray booth is in compliance with this requirement.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the particulate from the shot blaster shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and

P = process weight rate in tons per hour

The shot blaster process shall be limited to 1.11 lbs/hr. The dust collector, for the blasting room shall be in operation at all times the shot blaster is in operation, in order to comply with this limit.

Conclusion

The operation of this Metals Preparation Facility shall be subject to the conditions of the attached proposed Registration and Local Operation Permits.

ALABAMA POWER LAW (CDS)/EIS CALCULATIONS

J.L. Manta, A Division of
Kenny Industrial Services, LLC
 141 - 141st Street
 Hammond, IN 46327

PLANT ID NO: N/A
 INSP DATE:
 CALC DATE: 2/18/03

YEAR OF DATA: **Review**

NO. OF POINTS: 3

CALCULATIONS BY: Kristina Massey

NOTES

EF: EMISSION FACTOR
 CE: CONTROL EFFICIENCY

MDR: MAXIMUM DESIGN RATE
 MDC: MAXIMUM DESIGN CAPACITY

Ts: STACK DISCHARGE TEMPERATURE
 UNITS FOR EMISSIONS ARE IN (TPY) EXCEPT WHERE GIVEN

Black Beauty Abrasive Blasting

CNTRL DEV: Portable Reverse Pulse Jet
 Cartridge Dust Collector

MDR (T/hr): 0.143

YEARLY PROD (T/yr): 235

STACK ID (DIAM:HEIGHT): Vent inside

FLOWRATE (ACFM): 14000

Ts(°F): 70

PERMITTED OPERATING HRS: **8760** hr/yr

SCC NO. 3-09-002-03			POTENTIAL EMISSIONS						ALLOWABLE		COMPANY ACTUAL	
POLLUTANT	EF(LB/T)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)	BEFORE CONTROLS	AFTER CONTROLS
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)				
PM	20	0.999	2.86	68.57	12.51	0.0029	0.0125	0.00002	1.110	4.862	2.350	0.0024
PM10	14	0.999	2.00	48.00	8.76	0.0020	0.0088	0.00002	1.110	4.862	1.645	0.0016
SOx	0	0	0.00	0.00	0.00	0.0000	0.0000	N/A	0	0	0.000	0.0000
NOx	0	0	0.00	0.00	0.00	0.0000	0.0000	N/A	0	0	0.000	0.0000
VOC	0	0	0.00	0.00	0.00	0.0000	0.0000	N/A	0	0	0.000	0.0000
CO	0	0	0.00	0.00	0.00	0.0000	0.0000	N/A	0	0	0.000	0.0000
LEAD	0	0	0.00	0.00	0.00	0.0000	0.0000	N/A	0	0	0.000	0.0000

326 IAC 6-3-2

Air Quality Permits Handbook:

Table 3.2 Emission Factors for Abrasives

Abrasives: (Grit)

EF (PM) = 0.01 lb PM/lb Abrasive = 20 lb/T

EF (PM10) = 0.70 lb PM10/lb PM = 14 lb/T

MDR = Maximum amount of Abrasive used per Batch / Minimum time to complete Batch

(worst case)

Spray Painting Operation

*MDR (gal/hr): 0.580
YEARLY PROD (gal/yr): 1333

STACK ID (DIAM:HEIGHT): NoStack
FLOWRATE (ACFM): N/A
Ts(*F): N/A

CNTRL DEV: Accordian filter

SCC NO. 4-02-001-10			PERMITTED OPERATING HRS: 8760 hr/yr						ALLOWABLE		COMPANY ACTUAL	
			POTENTIAL EMISSIONS									
			BEFORE CONTROLS			AFTER CONTROLS					BEFORE CONTROLS	AFTER CONTROLS
POLLUTANT	*EF(lb/gal)	CE (%)	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)		
PM	1.68	0.9	0.97	23.39	4.27	0.10	0.43	N/A	0.10	0.43	1.120	0.112
PM10	1.68	0.9	0.97	23.39	4.27	0.10	0.43	N/A	0.10	0.43	1.120	0.112
SOx	0	0	0.00	0.00	0.00	0.00	0.00	N/A	0.00	0.00	0.000	0.000
NOx	0	0	0.00	0.00	0.00	0.00	0.00	N/A	0.00	0.00	0.000	0.000
VOC	3.50	0	2.03	48.72	8.89	2.03	8.89	N/A	2.03	8.89	2.333	2.333
CO	0	0	0.00	0.00	0.00	0.00	0.00	N/A	0.00	0.00	0.000	0.000
LEAD	0	0	0.00	0.00	0.00	0.00	0.00	N/A	0.00	0.00	0.000	0.000

* This point has potential emissions below the State's registration thresholds.

326 IAC 8-2-9 (d)(3) - 3.5 lbs/gallon

MDR = Maximum amount of Coating used per Batch (gal) / Minimum time to complete Batch (hr) (worst case)

VOC EF = Maximum content of extreme performance coatings per 326 8-2-9 (d)(3) (worst case)

PM EF = 13.95 lbs/gal * 80.4 (%solids by weight) * 0.15 (Application Loss)

Potential emissions of Xylene and Ethylbenzene, air toxics, are 80% (7 TPY) and 15% (1.3 TPY), respectively, of the VOC use. This does not constitute a major source for HAPS.

Space Heaters (32) Units

(Natural Gas Combustion)

MDC (MMBtu/hr): 9.364
MDR (MMcft/hr): 0.0094

HEAT CONTENT (Btu/cft): 1000
QTY BURNED (mmcft/yr): 11.7

STACK ID (DIAM:HEIGHT): various
FLOWRATE (ACFM): various

CNTRL DEV: NONE

SCC NO. 1-03-006-03			PERMITTED OPERATING HRS: 8760 hr/yr						ALLOWABLE		COMPANY ACTUAL	
			POTENTIAL EMISSIONS									
			BEFORE CONTROLS			AFTER CONTROLS					BEFORE CONTROLS	AFTER CONTROLS
POLLUTANT	EF(lbs/MMcft)	CE (%)	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)		
PM	7.6	0	0.071	1.708	0.312	0.071	0.312	N/A	0.071	0.312	0.044	0.044
PM10	7.6	0	0.071	1.708	0.312	0.071	0.312	N/A	0.071	0.312	0.044	0.044
SOx	0.6	0	0.006	0.135	0.025	0.006	0.025	N/A	0.006	0.025	0.004	0.004
NOx	100	0	0.936	22.474	4.101	0.936	4.101	N/A	0.936	4.101	0.585	0.585
VOC	5.5	0	0.052	1.236	0.226	0.052	0.226	N/A	0.052	0.226	0.032	0.032
CO	84	0	0.787	18.878	3.445	0.787	3.445	N/A	0.787	3.445	0.491	0.491
LEAD	0.0005	0	0.000	0.000	0.000	0.000	0.000	N/A	0.000	0.000	0.000	0.000

* This point has potential emissions below the State's registration thresholds.

Hammond Air Quality Control Ordinance #3522 (as amended)

see natural gas heaters summation below

Totals

POLLUTANT	POTENTIAL EMISSIONS						ALLOWABLE		COMPANY ACTUAL	
	BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)	BEFORE CONTROLS	AFTER CONTROLS
	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)				
PM	3.903	93.665	17.094	0.171	0.751	#VALUE!	1.279	5.600	3.514	0.159
PM10	3.046	73.094	13.340	0.171	0.747	#VALUE!	1.279	5.600	2.809	0.158
SOx	0.006	0.135	0.025	0.006	0.025	#VALUE!	0.006	0.025	0.004	0.004
NOx	0.936	22.474	4.101	0.936	4.101	#VALUE!	0.936	4.101	0.585	0.585
VOC	2.082	49.956	9.117	2.082	9.117	#VALUE!	2.082	9.117	2.365	2.365
CO	0.787	18.878	3.445	0.787	3.445	#VALUE!	0.787	3.445	0.491	0.491
LEAD	0.000	0.000	0.000	0.000	0.000	#VALUE!	0.000	0.000	0.000	0.000

* This Source is classed "Registered" according to potential emissions.

J.L. Manta - Summation of Natural Gas Combustion Units (32)

Quantity	Description	Model ID	Btu/hr
1	Magic Chef	G76-100DZCZ.5-1	100,000
2	Dayton Fuel Tram.	4E462	2 x 400,000 = 800,000
12	Detroit Radiant	DTH40-150N3	12 x 150,000 = 1,800,000
1	Reznor	FUS-50-F	50,000
2	Sterling	QUF45	2 x 45,000 = 90,000
1	Rupp	THP-550	550,000
1	Rupp	THP-550	550,000
1	Rupp	THP-500	500,000
1	Sterling	QUEF200	200,000
1	Modine	PAE50AC	50,000
1	Dayton	3E391	300,000
1	Dayton	3E389	100,000
1	Dayton	3E392	400,000
1	Lennox	LF24-50A-3	50,000
1	Lennox	G23Q3/4-125-4	125,000
1	Goodman	GU100-3	100,000
1	Landa	VNG Pressure Washer	750,000
1	Rupp	CFA225	2,799,000
1	Lennox	LF24-50A-3	50,000
Total			9,364,000 Btu/hr